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*Attorneys for Plaintiffs Theresa Beiner and
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Inc., et al., No. 3:18-CV-1953*

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

LAUREN PRICE, on behalf of herself and
all others similarly situated,

Plaintiffs,

v.

FACEBOOK, INC., and CAMBRIDGE
ANALYTICA, LLC

Defendants.

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CASE NO. 3:18-CV-01732-VC

**PLAINTIFFS THERESA BEINER AND
BRANDON HAUBERT'S NOTICE OF
RELATED CASES AND
ADMINISTRATIVE MOTION TO
CONSIDER WHETHER CASES SHOULD
BE RELATED**

(Civil L.R. 3-12(b) and 7-11)

Action Filed: March 20, 2018

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

Pursuant to Rule 3-12(b) and Rule 7-11 of the Civil Local Rules, plaintiffs Theresa Beiner and Brandon Haubert in *Beiner, et al. v. Facebook, Inc., et al.*, No 3:18-CV-1953 (N.D. Cal.) (“Beiner Action”), respectfully move the Court to consider whether their action is related to five cases in this District, *Price v. Facebook, Inc., et al.*, Case No. 3:18-cv-01732 (filed March 20, 2018) (“Price Action”), *Rubin v. Facebook, Inc., et al.*, Case No. 3:18-cv-01852 (filed March 26, 2018) (“Rubin Action”), *Gennock et al. v. Facebook, Inc., et al.*, Case No. 4:18-cv-01891 (filed March 27, 2018) (“Gennock Action”), *O’Kelly v. Facebook, Inc., et al.*, Case No. 3:18-cv-01915 (filed March 28, 2018) (“O’Kelly Action”), and *Haslinger v. Facebook, Inc., et al.*, Case No. 4:18-cv-01984-YGR (filed March 30, 2018) (“Haslinger Action”).

1. Under Local Rule 3-12(a), actions are related to another when: “(1) The actions concern substantially the same parties, property, transaction or event; and (2) It appears likely that there will be an unduly burdensome, duplication of labor and expense or conflicting results if the cases are conducted before different Judges.” The Beiner Action should be related to the Price Action, the Rubin Action, the Gennock Action, the O’Kelly Action, and the Haslinger Action as these cases concern the same or similar parties, i.e., Facebook, Inc. (“Facebook”) and Cambridge Analytica, LLC (“Cambridge”). All actions relate to the massive unauthorized exfiltration of Facebook user data for use by Cambridge Analytica for “psychometric” targeted advertising during the 2016 presidential election campaign. Generally, plaintiffs in the Actions allege that Facebook allowed unauthorized individuals to gain access to its data network storing the private personal information of more than 100 million United States consumers. The exfiltrated information was used to create targeted advertising for what has been described as a campaign of “psychological warfare” during the 2016 presidential election. All of the Actions allege violations of various state and federal statutes and common law principles against Facebook relating to its harmful policies and conduct and all seek certification of a similar class of victims. Also related to these actions, on March 29, 2018, Plaintiffs in the Beiner Action filed a Motion for Transfer of Actions to the Northern District of California for Consolidation Pursuant to 28 U.S.C. §1407 before the U.S. Judicial Panel on Multi-District Litigation. That motion was accepted for filing,

1 as MDL Number 2843, on March 30, 2018.

2 2. Because the Beiner Action, the Price Action, the Rubin Action, the Gennock
3 Action, the O’Kelly Action and the Haslinger Action “concern substantially the same parties,
4 property, transaction or event,” these actions are related within the meaning of Civil Local Rule
5 3-12(a)(1). As a result, this will promote efficiency and judicial economy and will avoid “unduly
6 burdensome duplication of labor and expense or conflicting results.” Civ. L.R. 3-12(a)(2).

7 Accordingly, the Court should grant this administrative motion and issue the
8 accompanying proposed order holding that:

9 (1) The Beiner Action, the Price Action, the Rubin Action, the Gennock Action, the
10 O’Kelly Action, and the Haslinger Action are related under Civil Local Rule 3-
11 12(a); and

12 (2) The related actions should be assigned to this Court’s calendar under Civil Local
13 Rule 3-12(f).

14 Pursuant to Civil L.R. 3-12 and 7-11, an Administrative Motion to Relate Case is
15 contemporaneously being lodged and served in the Price Action, the Rubin Action, the Gennock
16 Action, the O’Kelly Action and the Haslinger Action.

17 Dated: April 2, 2018

18 By: /s/ Hank Bates

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